

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

LLADISA MARTINEZ, Individually §
and as Next Friend of XXXXX §
XXXXXXXX, XXXXXXX XXXXXXX §
XXXXX XXXXXXX & XXXXX XXXXXXX §
Minor Children §
V. §
WERNER ENTERPRISES, INC. and §
SELVIN S. MARTIN §

CIVIL ACTION NO. 2:16-CV-00185

DEFENDANTS, WERNER ENTERPRISES, INC. AND SELVIN S. MARTIN'S
NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS:

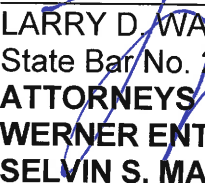
Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, **WERNER ENTERPRISES, INC. and SELVIN S. MARTIN** hereby removes this action to the United States District Court for the Western District of Texas from the 293rd Judicial District Court of Maverick County, Texas, stating as follows:

1. Plaintiffs commenced this action in the 293rd Judicial District Court of Maverick County, Texas, where it was given Cause No. 16-09-33430-MCV. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant Werner Enterprises, Inc. is a Nebraska Corporation and Defendant, Selvin S. Martin is a resident of Georgia. Further, Plaintiffs claim damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.
2. Defendant, Werner Enterprises, Inc., was served with this summons and complaint on November 11, 2016, so this removal is timely under 28 U.S.C. § 1446(b).

3. A copy of all process, pleadings, and orders served upon Defendants is attached as Exhibit A.
4. Defendants have provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 293rd Judicial District Court of Maverick County, Texas.
5. Defendants, Werner Enterprises, Inc. and Selvin S. Martin consent to the removal.

Dated: December  2016

Respectfully submitted,



LARRY D. WARREN
State Bar No. 20888450
**ATTORNEYS FOR DEFENDANTS
WERNER ENTERPRISES, INC. and
SELVIN S. MARTIN**

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 8 day of December 2016, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel via facsimile:

Via Facsimile: (830) 757-4333

Earl M. Herring

State Bar No. 09534140

Kimberly D. Cantu

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ATTORNEYS FOR PLAINTIFFS



LARRY D. WARREN